

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) Docket No. 20-cr-40036-TSH
)
)
VINCENT KIEJZO)
)

ASSENTED-TO MOTION TO CONTINUE SUPPRESSION HEARING

Defendant, Vincent Kiejzo, respectfully requests that this Honorable Court continue the hearing on Defendant's Motion to Suppress, presently scheduled for September 9, 2022. As grounds therefor, counsel states that Mr. Kiejzo filed his Motion to Suppress on June 1, 2022, and this court scheduled a hearing on the matter to take place on September 9, 2022. On September 6, 2022, the government filed its Opposition to the defendant's motion. Counsel filed, on today's date, an assented-to motion for leave to file a reply, to address narrow issues raised in the government's opposition. To ensure both that the matter is fully briefed in advance of any hearing or the court's decision and to permit the defendant and his counsel sufficient time to prepare, counsel for Mr. Kiejzo respectfully requests that this court continue the scheduled suppression hearing for a date in October 2022, on a date convenient to the court and to the parties. Undersigned counsel conferred with the government, through Assistant United States Attorney Kristen Noto, and understands that the government does not object to a continuance.

Respectfully submitted,

Date: 9/7/22

/s/ Sandra Gant
Sandra Gant, BBO # 680122
Federal Public Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210

Tel: 617-223-8061

/s/ Caitlin Jones

Caitlin Jones, MN ID # 0397519
Federal Public Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
Tel: 617-223-8061
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 7, 2022.

/s/ Sandra Gant
Sandra Gant